

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE
COMPANY, GEICO INDEMNITY COMPANY,
GEICO GENERAL INSURANCE COMPANY and
GEICO CASUALTY COMPANY,

Docket No.: 1:21-cv-01986-PKC-RLM

Plaintiffs,

-against-

WALLEGOOD, INC., et al.

Defendants.
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DECLARATION OF DANIEL CURTO

Daniel Curto, hereby declares the truth of the following pursuant to 28 U.S.C. § 1746:

1. I am employed by Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively, “GEICO”) as a supervisor in the Company’s Special Investigative Unit (“SIU”).

2. I am responsible for conducting and overseeing investigations of healthcare providers suspected of being ineligible for reimbursement and/or having engaged in fraudulent treatment and billing practices.

3. I have personal knowledge of the facts set forth in this declaration and would testify as to them in a Court of law if called upon to do so.

4. I am familiar with the GEICO’s investigation of Wallegood, Inc. (“Wallegood”) and its owner, Aleksander Chernyshev (“Chernyshev”)(collectively the “Wallegood Defendants”).¹

¹ The facts set forth in this declaration are not intended to be a complete recitation of GEICO’s investigation into the Wallegood Defendants, but simply facts that I have been asked to provide in regard to a pending motion that GEICO has filed.

According to GEICO's records, Wallegood first started providing DME to GEICO Insureds on or about April 12, 2018. GEICO received the first bill from Wallegood on or about May 21, 2018.


5. Wallegood no longer bills GEICO for providing DME to GEICO Insureds. According to GEICO's records, the last date Wallegood provided DME to a GEICO Insured was November 6, 2019. In addition, GEICO has not received any bills from Wallegood for DME claimed to have been provided to GEICO Insureds after November 6, 2019.

6. On August 10, 2020, a GEICO investigator went to the location on Gerritsen Avenue in Brooklyn, New York where Wallegood had been operating. The investigator noted that (i) Wallegood was no longer operating from the location, and that (ii) a security gate was closed around the entire storefront, blocking the doorway and storefront windows. There was no visible signage or any other indication that Wallegood was conducting business from the location. Independent of the investigator's visit, I attempted to determine whether Wallegood was operating out of any other location. Notably:

- I could not find a new operating address for Wallegood;
- The New York State Department of State confirms that while Wallegood is an active corporation, the Gerritsen Avenue Location is still listed as its primary address; and
- An internet search on Wallegood did not reveal a second or updated address.

7. In addition, I conducted an asset search to determine whether Wallegood owned any personal or real property or had any other business interests. That search revealed that Wallegood did not own any personal or real property.

I declare the truth of the following subject to the penalties of perjury. Executed at Woodbury, New York on June 21, 2021.

DocuSigned by:

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Daniel Curto